

BEFORE THE  
BOARD OF REGISTERED NURSING  
DEPARTMENT OF CONSUMER AFFAIRS  
STATE OF CALIFORNIA

In the Matter of the Statement of Issues Against;

**AMBER DENISE COXSOM**

Applicant for Registered Nurse License

Respondent

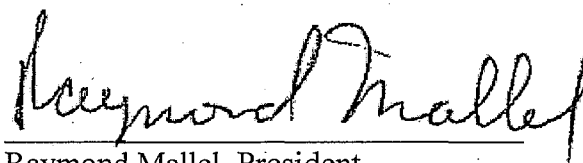
Case No. 2013-271

**DECISION AND ORDER**

The attached Stipulated Settlement and Disciplinary order for Public Reprimand is hereby adopted by the Board of Registered Nursing, Department of Consumer Affairs, as its Decision in this matter.

This Decision shall become effective on **May 16, 2013**.

IT IS SO ORDERED **April 16, 2013**.



Raymond Malle, President  
Board of Registered Nursing  
Department of Consumer Affairs  
State of California

1 KAMALA D. HARRIS  
Attorney General of California  
2 KAREN B. CHAPPELLE  
Supervising Deputy Attorney General  
3 THOMAS L. RINALDI  
Deputy Attorney General  
4 State Bar No. 206911  
300 So. Spring Street, Suite 1702  
5 Los Angeles, CA 90013  
Telephone: (213) 897-2541  
6 Facsimile: (213) 897-2804  
*Attorneys for Complainant*

7  
8 **BEFORE THE**  
**BOARD OF REGISTERED NURSING**  
**DEPARTMENT OF CONSUMER AFFAIRS**  
9 **STATE OF CALIFORNIA**

10 In the Matter of the Statement of Issues  
11 Against:

12 **AMBER DENISE COXSOM**  
2804 1/2 W. Vernon Ave  
13 Los Angeles, CA 90008  
Registered Nurse License Applicant

14 Respondent.  
15

Case No. 2013-271

**STIPULATED SETTLEMENT AND  
DISCIPLINARY ORDER**

16 IT IS HEREBY STIPULATED AND AGREED by and between the parties to the above-  
17 entitled proceedings that the following matters are true:

18 PARTIES

19 1. Louise R. Bailey, M.Ed., RN (Complainant) is the Executive Officer of the Board of  
20 Registered Nursing. She brought this action solely in her official capacity and is represented in  
21 this matter by Kamala D. Harris, Attorney General of the State of California, by Thomas L.  
22 Rinaldi, Deputy Attorney General.

23 2. Respondent Amber Denise Coxson (Respondent) is represented in this proceeding by  
24 attorney Jeffrey S. Kravitz, Esq., whose address is 6747 Fair Oaks Boulevard, Carmichael, CA  
25 95608-3811.

26 3. On or about January 20, 2012, Respondent filed an application dated January 17,  
27 2012, with the Board of Registered Nursing to obtain a Registered Nurse License.  
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CONTINGENCY

11. This stipulation shall be subject to approval by the Board of Registered Nursing. Respondent understands and agrees that counsel for Complainant and the staff of the Board of Registered Nursing may communicate directly with the Board regarding this stipulation and settlement, without notice to or participation by Respondent or her counsel. By signing the stipulation, Respondent understands and agrees that she may not withdraw her agreement or seek to rescind the stipulation prior to the time the Board considers and acts upon it. If the Board fails to adopt this stipulation as its Decision and Order, the Stipulated Settlement and Disciplinary Order shall be of no force or effect, except for this paragraph, it shall be inadmissible in any legal action between the parties, and the Board shall not be disqualified from further action by having considered this matter.

12. The parties understand and agree that facsimile copies of this Stipulated Settlement and Disciplinary Order, including facsimile signatures thereto, shall have the same force and effect as the originals.

13. This Stipulated Settlement and Disciplinary Order is intended by the parties to be an integrated writing representing the complete, final, and exclusive embodiment of their agreement. It supersedes any and all prior or contemporaneous agreements, understandings, discussions, negotiations, and commitments (written or oral). This Stipulated Settlement and Disciplinary Order may not be altered, amended, modified, supplemented, or otherwise changed except by a writing executed by an authorized representative of each of the parties.

14. In consideration of the foregoing admissions and stipulations, the parties agree that the Board may, without further notice or formal proceeding, issue and enter the following Disciplinary Order:

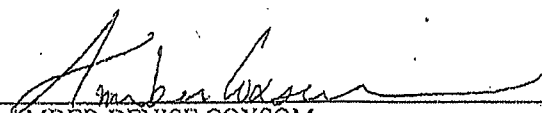
DISCIPLINARY ORDER

IT IS HEREBY ORDERED that the application of Respondent shall be granted, and upon completion of all examination and licensing requirements, her Registered Nurse License shall, by way of letter from the Board's Executive Officer, be publicly reprovved. The letter shall be in the same form as the letter attached as Exhibit B to this stipulation.

1 ACCEPTANCE

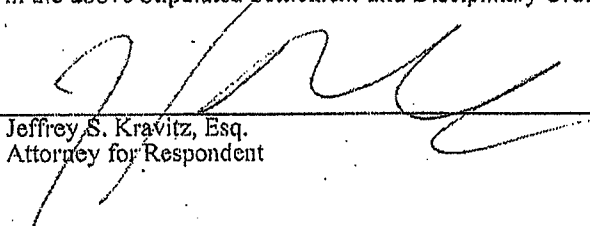
2 I have carefully read the above Stipulated Settlement and Disciplinary Order and have fully  
3 discussed it with my attorney, Jeffrey S. Kravitz, Esq.. I understand the stipulation and the effect  
4 it will have on my Registered Nurse License. I enter into this Stipulated Settlement and  
5 Disciplinary Order voluntarily, knowingly, and intelligently, and agree to be bound by the  
6 Decision and Order of the Board of Registered Nursing.

7  
8 DATED: 2/24/13

  
9 AMBER DENISE COXSOM  
Respondent

10 I have read and fully discussed with Respondent Amber Denise Coxson the terms and  
11 conditions and other matters contained in the above Stipulated Settlement and Disciplinary Order.  
12 I approve its form and content.

13 DATED: 2-27-13

  
14 Jeffrey S. Kravitz, Esq.  
15 Attorney for Respondent

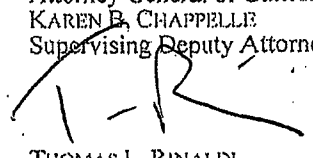
16 ENDORSEMENT

17 The foregoing Stipulated Settlement and Disciplinary Order is hereby respectfully  
18 submitted for consideration by the Board of Registered Nursing of the Department of Consumer  
19 Affairs.

20 Dated: 2-27-2013

Respectfully submitted,

21 KAMALA D. HARRIS  
22 Attorney General of California  
23 KAREN B. CHAPPELLE  
24 Supervising Deputy Attorney General

  
25 THOMAS L. RINALDI  
26 Deputy Attorney General  
27 Attorneys for Complainant

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**Exhibit A**

**Statement of Issues No. 2013-271**

1 KAMALA D. HARRIS  
Attorney General of California  
2 KAREN B. CHAPPELLE  
Supervising Deputy Attorney General  
3 THOMAS L. RINALDI  
Deputy Attorney General  
4 State Bar No. 206911  
300 So. Spring Street, Suite 1702  
5 Los Angeles, CA 90013  
Telephone: (213) 897-2541  
6 Facsimile: (213) 897-2804  
*Attorneys for Complainant*

8 **BEFORE THE**  
9 **BOARD OF REGISTERED NURSING**  
10 **DEPARTMENT OF CONSUMER AFFAIRS**  
11 **STATE OF CALIFORNIA**

11 In the Matter of the Statement of Issues  
12 Against:

13 **AMBER DENISE COXSOM**

14 Registered Nurse License Applicant

15 Respondent.

Case No. 2013-271

16 **STATEMENT OF ISSUES**

16 Complainant alleges:

17 **PARTIES**

18 1. Louise R. Bailey, M.Ed., RN (Complainant) brings this Statement of Issues solely in  
19 her official capacity as the Executive Officer of the Board of Registered Nursing, Department of  
20 Consumer Affairs (Board).

21 2. On or about January 20, 2012, the Board received an application for a Registered  
22 Nurse License from Amber Denise Coxsom (Respondent). On or about January 17, 2012, Amber  
23 Denise Coxsom certified under penalty of perjury to the truthfulness of all statements, answers,  
24 and representations in the application. The Board denied the application on March 16, 2012.

25 **JURISDICTION**

26 3. This Statement of Issues is brought before the Board under the authority of the  
27 following laws. All section references are to the Business and Professions Code unless otherwise  
28 indicated.

**STATUTORY PROVISIONS**

4. Section 480 states, in pertinent part:

"(a) A board may deny a license regulated by this code on the grounds that the applicant has one of the following:

"(1) Been convicted of a crime. A conviction within the meaning of this section means a plea or verdict of guilty or a conviction following a plea of nolo contendere. Any action that a board is permitted to take following the establishment of a conviction may be taken when the time for appeal has elapsed, or the judgment of conviction has been affirmed on appeal, or when an order granting probation is made suspending the imposition of sentence, irrespective of a subsequent order under the provisions of Section 1203.4 of the Penal Code.

"(2) Done any act involving dishonesty, fraud, or deceit with the intent to substantially benefit himself or herself or another, or substantially injure another.

"(3) (A) Done any act that if done by a licensee of the business or profession in question, would be grounds for suspension or revocation of license.

"(B) The board may deny a license pursuant to this subdivision only if the crime or act is substantially related to the qualifications, functions, or duties of the business or profession for which application is made.

"(b) Notwithstanding any other provision of this code, no person shall be denied a license solely on the basis that he or she has been convicted of a felony if he or she has obtained a certificate of rehabilitation under Chapter 3.5 (commencing with Section 4852.01) of Title 6 of Part 3 of the Penal Code or that he or she has been convicted of a misdemeanor if he or she has met all applicable requirements of the criteria of rehabilitation developed by the board to evaluate the rehabilitation of a person when considering the denial of a license under subdivision (a) of Section 482. . . ."

5. Section 490 states, in pertinent part:

"(a) In addition to any other action that a board is permitted to take against a licensee, a board may suspend or revoke a license on the ground that the licensee has been convicted of a crime, if the crime is substantially related to the qualifications, functions, or duties of the business



1 or profession for which the license was issued.

2 "(b) Notwithstanding any other provision of law, a board may exercise any authority to  
3 discipline a licensee for conviction of a crime that is independent of the authority granted under  
4 subdivision (a) only if the crime is substantially related to the qualifications, functions, or duties  
5 of the business or profession for which the licensee's license was issued.

6 "(c) A conviction within the meaning of this section means a plea or verdict of guilty or a  
7 conviction following a plea of nolo contendere. Any action that a board is permitted to take  
8 following the establishment of a conviction may be taken when the time for appeal has elapsed, or  
9 the judgment of conviction has been affirmed on appeal, or when an order granting probation is  
10 made suspending the imposition of sentence, irrespective of a subsequent order under the  
11 provisions of Section 1203.4 of the Penal Code."

12 6. Section 2736 provides that the Board may deny a license when it finds that the  
13 applicant has committed any acts constituting grounds for denial of licensure under section 480.

14 7. Section 2761 states, in pertinent part:

15 "The board may take disciplinary action against a certified or licensed nurse or deny an  
16 application for a certificate or license for any of the following:

17 "(a) Unprofessional conduct, . . .

18 . . . .

19 "(f) Conviction of a felony or of any offense substantially related to the qualifications,  
20 functions, and duties of a registered nurse, in which event the record of the conviction shall be  
21 conclusive evidence thereof. . . ."

22 **REGULATORY PROVISION**

23 8. California Code of Regulations, title 16, section 1444 states, in pertinent part:

24 "A conviction or act shall be considered to be substantially related to the qualifications,  
25 functions or duties of a registered nurse if to a substantial degree it evidences the present or  
26 potential unfitness of a registered nurse to practice in a manner consistent with the public health,  
27 safety, or welfare. Such convictions or acts shall include but not be limited to the following:

28 . . . .

1       “(c) Theft, dishonesty, fraud, or deceit. . . .”

2                               **FIRST CAUSE FOR DENIAL OF APPLICATION**

3                               **(Conviction of a Substantially Related Crime)**

4       9.     Respondent's application is subject to denial under sections 480, subdivision (a)(1),  
5     2736, and 2761, subdivision (f), in conjunction with California Code of Regulations, title 16,  
6     section 1444, in that on or about April 13, 2004, Respondent was convicted of one interlineated  
7     felony count of violating Penal Code section 496 [receiving or concealing stolen property] in a  
8     criminal proceeding entitled *The People of the State of California v. Amber Denise Coxson*  
9     (Super. Ct. Los Angeles County, Case No. YA056061). The circumstances underlying the  
10    conviction are that on or about August 21, 2003, Respondent in concert with two others acted as a  
11    look-out during a home burglary. As a result of the conviction, the Court placed Respondent on  
12    three (3) years probation and ordered her to complete 150 hours of community service.

13                               **SECOND CAUSE FOR DENIAL OF APPLICATION**

14                               **(Dishonest Acts)**

15       10.    Respondent's application is subject to denial under section 480, subdivision (a)(2), in  
16    that on or about August 21, 2003, Respondent committed acts involving dishonesty, fraud, or  
17    deceit with the intent to substantially benefit herself and others. Complainant refers to and by this  
18    reference incorporates the allegations set forth above in paragraph 9 as though set forth fully.

19                               **THIRD CAUSE FOR DENIAL OF APPLICATION**

20                               **(Conduct Warranting License Discipline)**

21       11.    Respondent's application is subject to denial under section 480, subdivision (a)(3)(A),  
22    in that Respondent committed acts which, if committed by a licensed registered nurse, would be  
23    grounds for suspension or revocation of the license pursuant to sections 490 and 2761,  
24    subdivision (f). Complainant refers to and by this reference incorporates the allegations set forth  
25    above in paragraph 9 as though set forth fully.

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**PRAYER**

WHEREFORE, Complainant requests that a hearing be held on the matters herein alleged, and that following the hearing, the Board issue a decision:

1. Denying the application of Amber Denise Coxson for a Registered Nurse License;
- and
2. Taking such other and further action as deemed necessary and proper.

DATED: October 11, 2012

Louise R. Bailey

LOUISE R. BAILEY, M.ED., RN  
Executive Officer  
Board of Registered Nursing  
Department of Consumer Affairs  
State of California  
Complainant

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**Exhibit B**

**Letter of Public Reproval in Case No. 2012-651**

**Board of Registered Nursing**  
P O Box 944210, Sacramento, CA 94244-2100  
P (916) 322-3350 | [www.rn.ca.gov](http://www.rn.ca.gov)  
**Louise R. Bailey, M.ED., RN, Executive Officer**



April 22, 2013

Amber Denise Coxsom  
2804 ½ W. Vernon Ave.  
Los Angeles, CA 90008

RE: LETTER OF PUBLIC REPROVAL  
In the Matter of the Statement of Issues Against:  
Amber Denise Coxsom (Case No. 2013-271)

Dear Ms. Coxsom:

On October 11, 2012, the Board of Registered Nursing (Board), Department of Consumer Affairs, State of California, filed a Statement of Issues in response to your appeal of the Board's denial of your application for a Registered Nurse License. The Statement of Issues alleges that on or around August 21, 2003, you were arrested for acting as a look-out during a home burglary. On or around April 13, 2004, that arrest resulted in your conviction of one felony count of violating Penal Code section 496 (Receiving or Concealing Stolen Property).

Taking into consideration certain mitigating factors, including the passage of time since the conviction, compliance with the terms and conditions of your probation, several positive character reference letters in addition to other mitigating circumstances in this case that support the determination that issuance of a registered nurse license will not jeopardize the public,, the Board has decided that the charges in the Statement of Issues warrant a public reproval.

Accordingly, in resolution of this matter under the authority provided under Business and Professions Code section 495, the Board of Registered Nursing, Department of Consumer Affairs issues this letter of public reproval.

Sincerely,

*Louise R. Bailey M.Ed., RN*  
LOUISE R. BAILEY, M.ED., R.N.  
Executive Officer  
Board of Registered Nursing  
Department of Consumer Affairs  
State of California